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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 18-CR-00258 EJD
)	
Plaintiff,)	UNITED STATES' ADMINISTRATIVE MOTION
)	TO SEAL AMENDED BILL OF PARTICULARS;
v.)	[PROPOSED] ORDER
)	
RAMESH "SUNNY" BALWANI,)	
)	(FILED UNDER SEAL)
Defendant.)	

The United States hereby moves to seal certain portions of its Amended Bill of Particulars in this matter. Consistent with the Court's Order dated February 11, 2020 (ECF No. 330), the government's Amended Bill of Particulars identifies misrepresentations Defendants caused to be directed to patient-victims of Defendants' fraud. In describing the specific false and misleading statements and disclosing the surrounding circumstances, the Amended Bill of Particulars identifies by name certain doctors and patients who received those statements from Defendants or their agents. In order to preserve the privacy of those third parties, the government seeks to seal the specific portions of the Amended Bill of

1 Particulars that disclose those names.

2 Similarly, the Court's Order required the government to provide the defense with the names of
3 any coconspirators associated with the conspiracy alleged in Count One of the operative Indictment, and
4 the Amended Bill of Particulars identifies those individuals. In order to preserve their privacy, the
5 government seeks to seal the portions of the Amended Bill of Particulars that contain those names.

6 An unredacted copy of the government's Amended Bill of Particulars is being submitted to the
7 Court along with this Motion. The government asks that that version of the document be filed on the
8 docket under seal. The government also is lodging with the Court a version of its Amended Bill of
9 Particulars redacting the doctor, patient, and coconspirator names discussed above. Should the Court
10 grant the instant motion to seal, the government will e-file a version of the Amended Bill of Particulars
11 containing those redactions on the public docket. An unredacted version of the Amended Bill of
12 Particulars was served on Defendants' counsel by email on approximately November 5, 2021.

13
14 DATED: January 3, 2022

Respectfully submitted,

15 STEPHANIE M. HINDS
16 United States Attorney

17 /s/ John C. Bostic

JEFF SCHENK

18 JOHN C. BOSTIC

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20 //

~~[PROPOSED]~~ ORDER

For good cause shown, IT IS HEREBY ORDERED THAT the portions of the United States' Amended Bill of Particulars listing the names of doctor and patient witnesses and previously unnamed coconspirators as to Count One in the operative Indictment shall be filed under seal until further Court Order, along with the United States' Administrative Motion to Seal.

IT IS SO ORDERED.

DATED: April 7, 2022



THE HONORABLE EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE